

OVERVIEW

blu-3 Holdings Limited and all subsidiary companies ('blu-3') aspires to the highest standards of corporate behaviour and competence, to ensure that safe, fair, and equitable procedures are applied to all blu-3 business transactions.

The underlying principle of this policy is to ensure that all blu-3 employees behave in an honest and ethical manner.

This policy should be read in conjunction with the blu-3 Anti-Fraud, Corruption and Bribery policy.

PURPOSE

The purpose of this policy statement is to set clear principles for observing and upholding the company's position on the giving and acceptance of gifts and hospitality.

The policy statement applies to all employees, full time, part time and temporary who work for blu-3, along with anyone working on behalf of or representing blu-3. This policy covers all business activities of the company including employees and others acting on behalf of blu-3. The policy provides guidance and advice on the offer and/or receipt of gifts, hospitality, sponsorship or the provision of gifts, hospitality, or sponsorship to others regarding business activities.

blu-3 expects that individuals and organisations that it deals with (clients, suppliers, contractors, service providers etc.) will act with integrity and without thought or actions which could be considered fraud or corruption. Evidence of such acts is most likely to lead to termination of contract and may lead to prosecution.

GENERAL PRINCIPLES

1. No gifts of cash to organisations that blu-3 deals with (clients, suppliers, contractors, service providers etc.) are permitted under any circumstance.
2. No gifts of cash are to be received by any employee or temporary/casual member affiliated with blu-3 from organisations who conduct business with blu-3 (clients, suppliers, contractors, service providers etc.).
3. Any hospitality or gift given or received, must be agreed in advance, and authorised by your Line Manager. any item over £10 must be approved by the General Manager, Operations Director or the Managing Director and have a receipt provided. The details must be accurately documented by the requesting/receiving employee and authorised by way of signature by one of the listed senior managers.
4. It is the requesting/receiving employee's responsibility to ask for receipts where appropriate and to maintain a record of all such gifts or hospitality.
5. Gifts or hospitality, given or received, under the value of £10 such as flowers or casual hospitality such as a business lunch, are acceptable without approval. However, this is only the case if it is a normal and appropriate expression of business courtesy and that the act of offering or accepting does not create, or appear to create, a conflict of interest, which could be construed as a bribe, an attempt to gain advantage or which could influence, or appear to influence, decisions which could be damaging to the company's reputation. However, it is to be noted that if the receipt of a gift or hospitality becomes a re-occurring instance then this would need to be assessed whether this contravenes the policy or subsequently halted altogether.

It is the responsibility of all employees to ensure that they are not placed in a position which risks, or appears to risk, conflict between their private interests and their work duties. Employees should ensure that they do not abuse their official position for personal gain or to benefit their family, friends, or associates.

6. It is the responsibility of all employees to notify the company in writing as soon as they become aware that a contract has been, or is proposed to be, entered into in which they have an

interest, if they are, or have been, directly involved in the negotiation of that contract. Please submit this in writing to People & Culture and the Compliance Team.

- 7. At the Christmas period all gifts received, must be given to corporate support for collation and distribution equally amongst the blu-3 employees.

blu-3 employees must apply the content of this policy and the blu-3 Anti-Corruption and Bribery policy when gifts and/or hospitality are given or received. All employees must consider all relevant factual circumstances and must refuse to give or accept gifts and/or hospitality if the act does not comply with company policies.

blu-3 expects that all employees at all levels will lead by example in ensuring adherence to legal requirements, contract procedure, financial procedure, codes of conduct and best professional practice.

DEFINITIONS

- **Hospitality** - Hospitality includes offers of food, refreshments, transport, accommodation and the use of facilities, equipment, or services, etc.
- **Gifts** - Gifts include offers of cash or cash equivalents (e.g., gift vouchers, lottery tickets or trade cards) and non-cash gifts e.g., pens, diaries, wine and spirits, hampers, electrical goods by suppliers, contractors, service users or their relatives, etc.
- **Sponsorship** - Events for which sponsorship is received from another organisation or events organised by other parties, which are sponsored by the company.
- **Bribery** - Bribery is defined as to dishonestly persuade someone to act in one's favour by paying him or her or giving some other inducement.

PROCEDURE/PROCESSES

Supporting procedures/processes are available on SharePoint; contained within the Procedure & Process section of the IMS.

Danny Chaney



Chairman

Gerry Curran



Chief Operations Officer

Ramnik Kapur



Chief Financial Officer

Paul Zeeyaart



Chief Commercial Officer

Richard Hope



Chief Delivery Officer